

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IAN POLLARD, on behalf of himself)	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:13-cv-00086-ODS
)	
REMINGTON ARMS COMPANY, LLC, et al.)	
)	
Defendants.)	
_____)	

**AMENDED JOINT MOTION FOR CONDITIONAL CERTIFICATION
OF SETTLEMENT CLASSES, PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT, APPROVAL OF NOTICE PLAN,
APPOINTMENT OF CLASS ACTION SETTLEMENT ADMINISTRATOR,
AND APPOINTMENT OF CLASS COUNSEL**

Plaintiffs Ian Pollard¹ and Defendants Remington Arms Company, LLC, Sporting Goods Properties, Inc., and E.I. du Pont de Nemours & Company move this Court for an Order pursuant to Fed. R. Civ. P. 23 that would: (1) conditionally certify the Settlement Classes; (2) preliminarily approve the terms of the proposed Settlement Agreement; (3) approve the proposed Notice Plan; (4) approve the Claim Forms; (5) appoint Angeion Group as the Class Action Settlement Administrator; (6) appoint Class Counsel; (7) schedule a Final Approval Hearing for approval of Class Certification and the Class Settlement; and (8) schedule dates by which the Parties and Settlement Class Members are to comply with their obligations as more fully set forth in the Suggestions in Support and the proposed order filed herewith.

¹ Pending before the Court is Plaintiffs' Motion for Leave to Amend the Class Action Complaint which additionally names Plaintiffs Rodney Barbre, Wallace Brown, Gordon Hardaway, William Moodie, James Waterman, and Mitchel Winterburn.

The facts and arguments in support of this Motion are set forth in the accompanying Suggestions in Support filed herewith.

WHEREFORE, the Parties move the Court an Order preliminarily approving the proposed Settlement, directing issuance of notice to the Class Members, appointing Angeion Group as the Class Action Settlement Administrator, scheduling a Final Hearing to consider final approval of the Settlement, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February, 2015, I filed the foregoing document with the clerk of the court using the court's CM/ECF system, which will serve electronic notice on all parties of interest.

/s John K. Sherk
**Attorneys for Defendants Remington
Arms Company, LLC, E.I. du Pont de
Nemours & Company, and Sporting
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